

**UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION**

SHONDEL CHURCH, et al.,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 17-04057-CV-C-NKL
)	
STATE OF MISSOURI, et al.,)	
)	
Defendants.)	

**CONSENT MOTION TO EXTEND DEADLINE FOR RESPONSE TO ATTORNEY
GENERAL'S OPPOSITION TO THE PARTIES' PROPOSED CONSENT JUDGMENT**

Come now Plaintiffs, with consent of Defendants, and move this Court to extend the deadline for the Parties' responses to the Missouri Attorney General's amicus brief in opposition to the Proposed Consent Judgment currently before this Court. Specifically, Plaintiffs request that the deadline for the Parties' responses be extended to **August 23, 2019**.

In support, Plaintiffs state:

1. On July 26, 2019, the Missouri Attorney General filed an amicus brief in opposition to the Parties' Proposed Consent Judgment, pursuant to the Court's July 12 Order denying the Attorney General's motion to intervene (Docket #238).
2. The Parties' current deadline to respond to the Attorney General's amicus brief is August 9, 2019.
3. Although Plaintiffs' counsel was initially prepared to file a timely response to the Attorney General's brief, a recent medical emergency involving the primary attorney tasked with drafting Plaintiffs' response, in addition to the unavailability of other Plaintiffs' counsel due to parental leave, has led to the need for a brief extension of the deadline.

4. The MSPD Defendants have consented to this request for an extension of time.

WHEREFORE Plaintiffs respectfully request this Court extend the deadline for the Parties' responses to the Attorney General's amicus brief to August 23, 2019.

Respectfully submitted,

<p><u>/s/ Jason D. Williamson</u> Jason D. Williamson* ACLU FOUNDATION 125 Broad Street, 18th Floor New York, NY 10004</p> <p>Anthony Rotherth Missouri Bar #44827 ACLU OF MISSOURI FOUNDATION 906 Olive Street, Suite 1130 St. Louis, MO 63101 Telephone: (314) 652-3114 Facsimile: (314) 652-3112 Email: arotherth@aclu-mo.org</p> <p>Gillian Wilcox Missouri Bar #61278 ACLU OF MISSOURI FOUNDATION 406 West 34th Street, Suite 420 Kansas City, MO 64111 Telephone: (816) 470-9933 Facsimile: (314) 652-3112 Email: gwilcox@aclu-mo.org</p>	<p>Amy Breihan Missouri Bar #65499 RODERICK & SOLANGE MACARTHUR JUSTICE CENTER 3115 South Grand Boulevard, Suite 300 St. Louis, MO 63118 Telephone: (314) 254-8540 Facsimile: (314) 254-8547 Email: amy.breihan@macarthurjustice.org</p> <p>Robert Sills* Matthew R. Shahabian* ORRICK, HERRINGTON & SUTCLIFFE LLP 51 West 52nd Street New York, NY 10019</p> <p>Evan Rose* Easha Anand* ORRICK, HERRINGTON & SUTCLIFFE LLP The Orrick Building 405 Howard Street San Francisco, CA 94105</p> <p>*Admitted Pro Hac Vice</p>
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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was served by operation of the Court CM/ECF system upon counsel for each of the Defendants on August 6, 2019.

/s/ Jason D. Williamson